

FEDERAL ELECTION COMMISSION

FEDERAL ELECTION
COMMISSION
SECRETARIAT

2010 JUN 17 P 1:13

In the matter of:

Gregory Brown
Gregory Brown for Congress

SENSITIVE

MUR No. **6314**

OFFICE OF GENERAL
COUNSEL

2010 JUN 15 PM 2:11

RECEIVED
FEDERAL ELECTION
COMMISSION

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Melanie Sloan bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against

Gregory Brown, Gregory Brown for Congress,

for direct and serious violations of the Federal Election Campaign Act ("FECA").

Complainants

2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

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3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate federal campaign finance laws. Through its website, press releases and other methods of distribution, CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities who violate campaign finance laws and deterring future violations of campaign finance law.

4. In order to assess whether an individual, candidate, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

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6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States and a registered voter and resident of the District of Columbia. As a registered voter, Ms. Sloan is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Sloan is harmed when a candidate, political committee or other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her and CREW's ability to review campaign finance information.

Respondents

8. Gregory Brown was a candidate in the June 8, 2010 South Carolina primary election seeking the nomination of the Democratic Party to represent the Sixth Congressional District of South Carolina in the U.S. House of Representatives. Gregory Brown for Congress is the principal campaign committee of Gregory Brown.

Factual Allegations

12. Gregory Brown filed a Statement of Candidacy with the FEC on January 27, 2010 designating Gregory Brown for Congress as his principal campaign committee. See Exhibit 2. Gregory Brown filed a Statement of Intention of Candidacy with the South Carolina Democratic Party on March 22, 2010 and paid the South Carolina Democratic Party a filing fee of \$3,480 on March 23, 2010. In addition, Gregory Brown for Congress paid the South Carolina Democratic Party a fee of \$1,200 for a copy of the voter file for the Sixth Congressional District on March 23, 2010. See Exhibit 3. Gregory Brown for Congress filed a Statement of Organization with the FEC on April 20, 2010. See Exhibit 4. Between April 14, 2010 and June 8, 2010, Gregory Brown for Congress purchased \$3,925 in cable and broadcast television and radio advertising in connection with the June 8, 2010 primary election in South Carolina. See Exhibit 5. Accordingly, Gregory Brown and/or Gregory Brown for Congress expended in excess of \$5,000 seeking election to Federal office.

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COUNT II

17. FECA and FEC regulations both require that the principal campaign committee of a candidate for the House of Representatives or the Senate file quarterly reports with the FEC no later than the fifteenth day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i).

18. By failing to file the April 15th Quarterly Report for calendar year 2010, Gregory Brown, Gregory Brown for Congress,

willfully violated both 2 U.S.C. § 434(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i).

COUNT III

19. FECA and FEC regulations both require that the principal campaign committee of a candidate for the House of Representatives or the Senate file a pre-election report with the FEC 12 days before any election in which the candidate is seeking election. 2 U.S.C. § 434(a)(2)(A)(i) and 11 C.F.R. § 104.5(a)(2)(i).

20. The 12-Day Pre-Primary Report for the June 8, 2010 Democratic primary election in South Carolina was due on May 27, 2010.

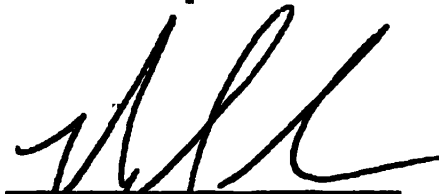
21. By failing to file the 12-Day Pre-Primary Report for the June 8, 2010 Democratic primary election in South Carolina on May 27, 2010,

Gregory Brown, Gregory Brown for Congress

**knowingly and willfully violated both 2 U.S.C.
§ 434(a)(2)(A)(i) and 11 C.F.R. § 104.5(a)(2)(i).**

CONCLUSION

**WHEREFORE, Citizens for Responsibility and Ethics in Washington and
Melanie Sloan request that the Federal Election Commission conduct an investigation
into these allegations, declare the respondents to have violated the Federal Election
Campaign Act and applicable FEC regulations, and impose sanctions appropriate to
these violations. The FEC should also take such further action as may be appropriate,
including referring knowing and willful violations to the Department of Justice for
criminal investigation.**




**Melanie Sloan
Executive Director
Citizens for Responsibility and Ethics
in Washington
1400 Eye Street, N.W.
Suite 450
Washington, DC 20005
(202) 408-5565 (phone)
(202) 588-5020 (fax)**

Verification

**Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify
that the statements made in the attached Complaint are, upon information and belief, true.**

Sworn pursuant to 18 U.S.C. § 1001.

A handwritten signature in black ink, appearing to be 'MS', written over a horizontal line.

Melanie Sloan

Sworn to and subscribed before me this 15th day of June, 2010.

A handwritten signature in black ink, appearing to be 'Lisa Drew', written over a horizontal line.

Notary Public

**Lisa Drew
District of Columbia, Notary Public
My Commission Expires
July 31, 2014**

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EXHIBIT 2

FEC FORM 2
STATEMENT OF CANDIDACY

RECEIVED
FEC MAIL CENTER
2010 FEB -1 AM 9:52

1. (a) Name of Candidate (in full) Gregory Anthony Brown		2. Candidate's Full Name as Printed	
(b) Principal Residence 1117 Weston Rd		3. Is This Statement Original <input checked="" type="checkbox"/> or Amended <input type="checkbox"/>	
(c) City, State, and ZIP Code Hopkins, SC 29061		4. Is This Statement Original <input checked="" type="checkbox"/> or Amended <input type="checkbox"/>	
5. Party Affiliation Democratic	6. Office Sought Congress	7. State or District of Candidate South Carolina 1st	

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2010 election.
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full) Gregory Brown for Congress
(b) Address (number and street) 791 Greenlawn Dr. Suite #7 P.O. Box 90807
(c) City, State, and ZIP Code Columbia, SC 29209

DESIGNATION OF OTHER AUTHORIZED COMMITTEES
(Including Joint Fundraising Representations)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidate.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)
(b) Address (number and street)
(c) City, State, and ZIP Code

I certify that I have executed this Statement and to the best of my knowledge and belief it is true, correct and complete.

Signature of Candidate Gregory A. Brown	Date 1/27/10
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NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. § 437g.

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FED FORM 2 (FEB 2008)

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10030233287

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EXHIBIT 3

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Statement of Intention of Candidacy - Partisan

- This form must be completed by a candidate seeking partisan office.
- A Statement of Intention of Candidacy must be filed with each party the candidate wishes to be the nominee.
- The S.C. Constitution prohibits a person who has been convicted of a felony from filing for public office for 15 years after the completion of the sentence, including probation and parole time, unless previously pardoned.

Name	Gregory Brown		Party	Democrat
Office	U.S. Representative SC-CD6		District	CD 6
Primary or Convention	Democratic Primary 2010	Election Date	June 8, 2010	
Address	1117 Weston Road	City	Hopkins	Zip 29061
Email Address	gbrown@grrt.net			
Telephone	Cell 803-414-9755	Home	803-774-5587	Work 803-454-2797
Voter Registration Number 1d645714				
Guidelines for a Candidate's Name to appear on the ballot: <ul style="list-style-type: none">• A given name or a derivative may be used• The name will not contain quotations, parentheses, or other distinguishing marks• Nicknames are allowed if they are used in good faith for honest purposes and do not:<ul style="list-style-type: none">• Imply professional or social status• Include an office or military rank• Exceed 15 letters				
Name as you wish it to appear on ballot (please print)		Gregory Brown		
Aide Ballot - Phonetically spell your name, if necessary		Example: Jackson Gervais: jnr-VAY		

Candidate's Oath I affirm that I meet, or will meet by the time of the general or special election, the qualifications for this office.	
Candidate's Signature	<i>Gregory A. Brown</i>

3/4/2010	2:29 pm
Ann B. Smith	
Democratic	

SC-CD6

SOUTH CAROLINA
ELECTION COMMISSION



Received 3/24, 2010
Time AM 2:29 PM
County of Richland

2010 DEMOCRATIC PARTY OF SOUTH CAROLINA
NOTICE OF CANDIDACY AND PLEDGE

Please type or print legibly

Name Gregory Brown

Home Address (include city, state, zip) 1117 WESTON ROAD, HOPKINS SC 29061

Mailing Address (if different from home address) _____

Telephone: (office) 803-454-2797 (home) 803-776-5754 (fax) 803-776-9026

Email: GBROWN

@ GETT.NET

I hereby file my notice as a candidate for the nomination as US REPRESENTATIVE - SC-CD6 in the primary election to be held on Tuesday, June 8, 2010.

I affiliate with the Democratic Party, and I hereby pledge myself to abide by the results of the primary.

I shall not authorize my name to be placed on the general election ballot by petition and will not offer or campaign as a write-in candidate for this office or any other office for which the party has a nominee.

I authorize the issuance of an injunction upon ex parte application by the party chair, as provided by law, should I violate this pledge by offering or campaigning in the ensuing general election for election to this office or any other office for which a nominee has been elected in the party primary election, unless the nominee for the office has become deceased or otherwise disqualified for election in the ensuing general election.

I hereby affirm that I meet, or will meet by the time of the general or special election, or as otherwise required by law, the qualifications for this office.

Please print or type name as you would like it to appear on the ballot:

GREGORY BROWN

Carol Bausinger
Party Chair

Carol Bausinger
Party Chair

3/22/10
Date

3/22/10
Date

CAROL BAUSINGER

Paid for by the DEMOCRATIC PARTY OF SOUTH CAROLINA - 1-800-841-1817 or www.scdp.org - and not authorized by any federal candidate or candidate's committee.

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GREGORY BROWN, FOR CONGRESS
P.O. Box 5087
Columbia, SC 29200

1016
OLIVER
BANK

3/23/10

Pay to the order of South Carolina Democratic Party \$ 3,420.00
Three Thousand Four Hundred & Twenty 00/100

 **WACHOVIA**
Member FDIC
Wachovia Bank, a Division of Wells Fargo Bank, N.A.
For John Doe



Cash _____

Check/MO _____

CC _____

Amount: \$ 1200

Received Date:
MAR 23 2011

Wire Transfer _____

Finance _____

GREGORY BROWN, FOR CONGRESS
P O Box 1000
Columbia, SC 29209

1017
ST-1000
RECEIVED

3/23/10

Pay to the order of SC Democratic Party \$ 1,200.00
Fundraiser Funded and
WACHOVIA
By: Wanda Bullock AB

ENTITY: _____

NAME: _____ PHONE: _____

ADDRESS: see above

CITY: _____ ST: _____ ZIP: _____

EMAIL: _____

OCCUPATION: _____ EMPLOYER: _____

EVENT: _____

I-J _____ FDR _____ Governor's Dinner _____ DC Event _____

State Convention _____ Unsolicited _____ Legislative Reception _____

SUSTAINING: Level - YD Com 100 Recurring - Yes ___ No ___ Amount: \$ _____ Starting: _____

Source of Contribution (Person Asking): _____

MISCELLANEOUS: vote/volunteer access

OTHER: _____

Transfer _____ Source: _____ Vote File (Candidate) Vote File (Other) _____

TREASURER'S USE ONLY

1 Stop _____ COMMITTEE _____ FED CC _____ NON-FED CC _____ NON-FED MM 1 _____
NON-FED MM 2 _____
RECEIVED

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EXHIBIT 4

11044303776

18030318252

PEC
FORM 1

STATEMENT OF ORGANIZATION

RECEIVED
FEDERAL CENTER
2018 APR 26 AM 8:42

1. NAME OF
COMMITTEE (in full)



(Check if name
is changed)

Example: Typing, type
over the line.

1377405

GREGORY BROWN FOR CONGRESS

ADDRESS (number and street)

11028 PICKENS ST.



(Check if address
is changed)

COLUMBIA

GA

30929-112450

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)



(Check if address
is changed)

nickie.gregorybrownforcongress.com

COMMITTEE'S WEB PAGE ADDRESS (URL)



(Check if address
is changed)

www.gregorybrownforcongress.com

2. DATE

04/14/2018

3. PEC IDENTIFICATION NUMBER

6

4. IS THIS STATEMENT



NEW (N)

OR



AMENDED (A)

I certify that I have completed this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

CAROL BAUSINGER

Signature of Treasurer

Carol Bausinger

Date

04/20/2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of a U.S.C. crime.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only				
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For further information contact:
Federal Election Commission
1111 Pennsylvania Avenue, N.E.
Washington, D.C. 20542
Toll Free 800-426-6962
Local 202-693-7100

PEC FORM 1
(Revised 08/08)

2. TYPE OF COMMITTEE

Candidate Committees

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate Gregory Brown

Candidate Party Affiliation Dem Office Sought ☒ House ☐ Senate ☐ President State SC District 6

- (c) ☐ This committee supports/apposes only one candidate, and is NOT an authorized committee.

Name of Candidate _____

Party Committees

- (a) ☐ This committee is a _____ (National, State, or substantially committee of the _____ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC)

- (a) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
- ☐ Corporation ☐ Corporation who Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registered PAC.

- (b) ☐ This committee supports/apposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registered PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representatives

- (a) ☐ This committee solicits contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (b) ☐ This committee solicits contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraising

1. _____ FED ID number C

2. _____ FED ID number C

3. _____ FED ID number C

4. _____ FED ID number C

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10030313253

11044303778

10850113254

Title or Type Committee Name

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name

Nickie Sharell Grant

Mailing Address

P.O. Box 90807

Columbia

SC

29290

Title or Position

CITY

STATE

ZIP CODE

Bookkeeper

Telephone number 803-260-8064

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

Cara Pausinger

Mailing Address

P.O. Box 90807

Columbia

SC

29290

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number 803-260-8064

Full Name of
Designated
Agent

Mailing Address

Title or Position

Telephone number

2. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Mailing Address

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

CITY

STATE

ZIP CODE

1-60503113255

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